



State of Arizona
Department of Education
Office of Diane M. Douglas
Superintendent of Public Instruction

Administrative Review Summary Report

School Food Authority Name: Florence Crittenton Service of Arizona, Inc.

CTD: 07-27-95

Site(s): Florence Crittenton Therapeutic Group Home

Contact: Clay Johnson, Support Services Manager

Review Date: 10/25/16

Review Period: September 2016

Programs Reviewed:



National School Lunch



School Breakfast



Afterschool Snack



Fresh Fruit & Vegetable



Special Milk

Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

Meal count totals for the month of review were not correctly combined and recorded. This was deemed a systemic error and contributed toward fiscal action calculations.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue specifically using Daily Edit Check to ensure accurate claims.

Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate claim. Additionally, please provide meal counts (Daily Edit Check) and claims for the month of November.

Performance Standard 2: Meal Components & Quantities- Critical Area

Repeat findings in quantities of one or more meal components was observed for the day of review/review period and contributed towards fiscal action. Specifically, minimum grain requirements and minimum meat/meat alternate requirements were not met during the week of review. On 9/11, nachos only contributed 1.0 ounce equivalent grain. On 9/14, five-cheese lasagna with breadstick only contributed 1.0 ounce equivalent grain and 1.5 ounce equivalent Meat/Meat Alternate. On 9/16, fish sticks only contributed 1.0 ounce equivalent grain.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in recipes, changing grain products, etc.). Meal pattern requirements for the National School Lunch Program & How to Plan a Lunch Menu Power Point can be found on ADE's website at http://www.azed.gov/health-nutrition/meal-pattern/ . Exhibit A: Whole Grain-Rich Ounce Equivalency Requirements can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2012/07/exhibit-a-sy1415.pdf	<i>Please provide a written description of the changes that have been made to ensure that portion sizes meet minimum amounts required by the meal pattern. Additionally, please provide a week of updated menus to demonstrate compliance.</i>
Documentation did not support that all required meal components were offered in the correct quantities during the review period. Specifically, Peanut Butter & Jelly alternative lunch did not meet meal pattern requirements of 2.0 ounce equivalents of grain and meat/meat alternate for the grade groups served. Additionally, production records did not reflect the daily alternative lunch item being offered (Peanut Butter & Jelly Sandwich).	Discussed requirements for recordkeeping and meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes such as adding a cheese stick and crackers to the Peanut Butter & Jelly Sandwich.	<i>Please provide a copy of a recently completed production record to ensure that documentation reflects all items served. Additionally, please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i>
Recipes provided did not contain all required sections: yield, serving size, standardized amount of ingredients in volume or weight for housemade salad bar components (potato salad, pasta salad, cucumber/tomato salad). As a result housemade salad bar components (potato salad, pasta salad, cucumber/tomato salad) could not be credited towards the meal pattern.	Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Examples of standardized recipes can be found on ADE's website at http://www.azed.gov/health-nutrition/meal-pattern/ .	<i>Please provide written assurance that all recipes will be updated with yield, serving size, standardized amount of ingredients in volume or weight. Additionally, an updated recipe for a housemade salad bar component must be provided.</i>

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

Self-Serve salad bar items include bacon bits, packaged crackers, croutons, pickles, olives, deli meats, and cheese. On-Site observation demonstrated multiple students taking large quantities of these items.	Discussed options to monitor and/or limit portion sizes for these options to ensure sodium and calorie limits are met.	<i>No corrective action needed.</i>
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Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

Unallowable expenditure "Grounds Maintenance" to U.S. Lawns of Central Phoenix charged \$192.72 to Nonprofit School Food Service Account.

Discussed unallowable charges with the Business Manager.

Please provide documentation showing that \$192.72 of food service costs was covered by a non-Federal fund source.

A process to sufficiently ensure compliance with the revenue from non-program foods requirements was not in place for adult meals.

Discussed Adult Meal price will vary every year due to changes in reimbursements and per meal value of USDA Foods. Suggested Adult Meal Price Formula: Federal reimbursement for a free student lunch + per meal value of USDA Foods = Minimum Adult Meal Price. Current per meal value of USDA Foods can be found at: <http://www.fns.usda.gov/fdd/value-donated-foods-notices>.

Please provide written assurance that the adult meal price will be updated yearly to reflect adjustments in USDA per meal value and reimbursements rates. If SFA chooses not to use the suggested Adult Meal Price Formula, please provide a description of how Adult Meal Prices will be calculated to ensure food cost, labor, and per value of USDA foods is covered.

For school year 2015-2016, a year-end review of total revenues and expenses showed that expenses were in excess of revenues.

Discussed that expenses of the non-profit school food service account must be limited to those costs which are necessary, reasonable, and allocable. An extensive list of allowable and unallowable costs can be found in 2 CFR 225.

Please provide written assurance that all expenses of the non-profit school food service account will be limited to those costs which are necessary, reasonable, and allocable. Additionally, please provide documentation showing that the excess expenses have been covered by a non-federal fund source.

General Program Compliance: Civil Rights

The non-discrimination statement used on program materials is not the most current USDA statement.	Discussed where to find non-discrimination statement on ADE's website at http://www.azed.gov/health-nutrition/civil-rights/ and whether long or short statement would be most appropriate.	<i>Please provide written assurance that all program materials have been updated with the proper language. Additionally, an updated program material with the correct non-discrimination statement must be provided to the reviewer.</i>
The 'And Justice for All' poster displayed at point of service is not the most current 'And Justice for All' poster.	Discussed how to obtain "And Justice For All" poster via ADE.	<i>Please provide written assurance that the current 'And Justice For All' poster has been displayed near all points of service where program participants can view it.</i>
Procedures for receiving and processing complaints alleging discrimination within the school meal programs are handled internally by a hearing prior to being forwarded to the State Agency.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint.	<i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.</i>

General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

The LWP did not contain required elements, specifically goals for other school-based activities to promote student wellness.	Reviewed handouts and discussed developing a LWP with required elements. Other School-Based Activities Ideas: HealthierUS School Challenge; offer staff wellness training to inspire them to serve as role models; sponsor health fairs; incorporate school gardens and/or Farm to School. Team Nutrition Resources can be found at http://teamnutrition.usda.gov	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP, and the date the update is expected to be completed.</i>
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The LWP did not contain required elements, specifically nutrition guidelines for all foods available on the school campus and a plan for measuring implementation.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Reviewed handouts and discussed developing a LWP with required elements. Nutrition Guidelines: LWP must be consistent with meal pattern and Smart Snacks regulations for foods sold. LWP must include a policy for foods given away (classroom snacks, classroom parties, incentives). Plan for Measuring Implementation: LEAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine: Compliance with the wellness policy; How the wellness policy compares to model wellness policies; Progress made in attaining the goals of the wellness policy. Wellness Policy Leadership: Required to designate one or more LEA official(s) or school official(s) who have the authority and responsibility to ensure that each school complies with the LWP.

Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the elements to be added, who will be involved in updating the LWP, and the date the update is expected to be completed.

The LWP did not contain goals for nutrition promotion.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Reviewed handouts and discussed feasible options for nutrition promotion goals that can be written into the LWP. Activity ideas: Offering contests, surveys, promotions and/or taste testing. Providing information to families to encourage consumption of healthy foods at home. Posting nutrition and health posters. Team Nutrition Resources can be found at <http://teamnnutrition.usda.gov>.

None required at this time.

The LWP did not contain policies for food and beverage marketing.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Additionally, discussed including policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Applies to : exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.

None required at this time.

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/health-nutrition/nslp/training/ .	<i>Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Director is registered for.</i>
The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/health-nutrition/nslp/training/ .	<i>Please provide updated tracker showing training requirements were met or the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Manager is registered for.</i>
Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training.	Discussed definition of "Non-Program Staff" and whether all staff members originally listed as Non-Program Staff are required to meet Professional Standards training hours. Discussed 6 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/health-nutrition/nslp/training/ .	<i>Please provide an updated list of Non-Program Staff. For those who meet the definition of Non-Program Staff, please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that these employees will receive.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

The most recent food safety inspection report was not posted in a publicly visible location.	Discussed making copies of most recent report and feasible places for posting. Copy of safety inspection was made and posted while on site.	<i>None required at this time.</i>
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General Program Compliance: Reporting & Recordkeeping

No findings.

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

Families were not notified of the availability of the SFSP prior to the end of the school year.	RCCL operates year-round. Provided TA to notify residents of the availability of the SFSP prior to their release date and determined which was most feasible. Summer feeding locations can be found at http://www.eatwellbewell.org/ . Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyhunger.org/ .	<i>None required at this time.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2017 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Comments/Recommendations:

Congratulations! Florence Crittenton Service of Arizona, Inc. has completed the Administrative Review for the 2016-2017 school year. You are doing an outstanding job implementing the National School Lunch and School Breakfast Programs. It is evident that you are working hard to ensure your students are fed healthy meals. Please keep up the great work and remember to contact ADE Health & Nutrition with any questions or concerns. Thank you for your hard work and hospitality throughout this review, it was a pleasure working with all of you.

To stay on track with NSLP requirements checkout the NSLP at a Glance Calendar & Monthly Checklist on our website at
http://www.azed.gov/health-nutrition/files/2016/07/sy-16_17-nslp-calendar7.20.16.pdf

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at
<http://www.azed.gov/health-nutrition/nslp/training/>

Fiscal Action Assessed?

☐ Yes- SBP ☒ No- SBP ☐ Yes- NSLP ☒ No- NSLP

Please submit corrective action response by December 15, 2016 to Kariann Gallegos, 1535 West Jefferson Street Bin #7, Phoenix, Arizona 85007.



11/21/2016

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the Administrative Review Appeal Procedures found in your Child Nutrition Programs Guidance Manual.



1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-4361 • www.azed.gov